

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARKANSAS FEDERAL CREDIT UNION)
and THE SUMMIT FEDERAL CREDIT)
UNION, on Behalf of Themselves and All) Case No. 19-cv-4492 (PKC)
Others Similarly Situated,)
)
) **PLAINTIFFS' UNOPPOSED MOTION**
Plaintiffs,) **FOR FINAL APPROVAL OF CLASS**
) **ACTION SETTLEMENT**
v.)
)
HUDSON'S BAY COMPANY, SAKS)
FIFTH AVENUE LLC, SAKS &)
COMPANY LLC, SAKS)
INCORPORATED, AND LORD &)
TAYLOR, LLC)
)
Defendants.)

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on December 7, 2021, at 2:30 p.m., before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York 10007, Plaintiffs Arkansas Federal Credit Union and The Summit Federal Credit Union, by and through Class Counsel, will move and hereby do move for an order, pursuant to Fed. R. Civ. P. 23(b)(2), 23(b)(3), & 23(e), (1) certifying the Settlement Class; and (2) granting final approval to the Settlement Agreement.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Plaintiffs will rely on the accompanying memorandum of law, the Declaration of Kari L. Schimdt of Analytics Consulting LLC, the previously filed Declaration of Joseph P. Guglielmo (ECF No. 86), the Supplemental Declaration of Joseph P. Guglielmo, and the accompanying exhibits. Plaintiffs' counsel have conferred with Defendants' counsel and confirmed that Defendants do not oppose Plaintiffs' Motion.

Dated: November 1, 2021

Respectfully submitted,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

/s/ Joseph P. Guglielmo

Joseph P. Guglielmo

Carey Alexander

The Helmsley Building

230 Park Avenue, 17th Floor

New York, NY 10169

Telephone: (212) 223-6444

Facsimile: (212) 223-6334

jguglielmo@scott-scott.com

calexander@scott-scott.com

Erin Green Comite

SCOTT+SCOTT ATTORNEYS AT LAW LLP

156 South Main Street

P.O. Box 192

Colchester, CT 06415

Telephone: (860) 537-5537

Facsimile: (860) 537-4432

ecomite@scott-scott.com

Karen S. Halbert

Michael L. Roberts

Jana K. Law

ROBERTS LAW FIRM, PA

P.O. Box 241790

Little Rock, AR 72223

Telephone: 501-821-5575

Facsimile: 501-821-4474

karenhalbert@robertslawfirm.us

mikeroberts@robertslawfirm.us

janalaw@robertslawfirm.us

Gary F. Lynch

LYNCH CARPENTER LLP

1133 Penn Avenue, 5th Floor

Pittsburgh, PA 15222

Telephone: 412-322-9243

Facsimile: 412-231-0246

gary@lcllp.com

*Attorneys for Plaintiffs Arkansas Federal Credit
Union and The Summit Federal Credit Union*